

# **Exhibit C**

**FRIENDS OF GEORGE'S, INC.,**

**vs.**

**MULROY, et al.**

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**30(b)(6)**

**VANESSA RODLEY**

**April 24, 2023**

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VETERAN COURT REPORTING  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

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FRIENDS OF GEORGE'S, INC.,

Plaintiff,

vs.

Case No. 2:23-CV-02163-tmp  
Case No. 2:23-CV-02176-tmp

STEVEN J. MULROY, in his  
individual capacity,

Defendant.

and

STATE OF TENNESSEE,

Defendant-Intervenor

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30(b)(6) Deposition of:

VANESSA RODLEY

Taken on behalf of the  
Defendant-Intervenor, via Zoom,  
April 24, 2023

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S T I P U L A T I O N S

The 30(b)(6) deposition of VANESSA RODLEY was taken by counsel for the Defendant-Intervenor, by Notice, via Zoom, on April 24, 2023, for all purposes under the Federal Rules of Civil Procedure.

All formalities as to caption, notice, statement of appearance, et cetera, are waived. All objections, except as to the form of the question, are reserved to the hearing, and that said deposition may be read and used in evidence in said cause of action in any trial thereon or any proceeding herein.

It is agreed that D. ROCHELLE KOENES, Notary Public and Licensed Court Reporter, for the State of Tennessee, may swear the witness, and that the reading and signing of the completed deposition by the witness were not discussed.

1                                   \*    \*    \*

2                   MR. TIMMONS: Before we get started, I                   09:01:26  
3 would like to put a running objection on the record,                   09:01:28  
4 if you don't mind.                   09:01:30

5                   MR. WILSON: Okay.                   09:01:32

6                   MR. TIMMONS: So to the extent that this                   09:01:33  
7 discovery is intended to address issues of standing,                   09:01:35  
8 we object on the basis that we don't think the State                   09:01:38  
9 of Tennessee, in its role as defending the                   09:01:43  
10 Constitutionality of the statute, has a basis to                   09:01:47  
11 raise standing. But, obviously, we're going to go                   09:01:51  
12 ahead and let you proceed and take your discovery                   09:01:54  
13 deposition.                   09:01:59

14                   We also intend to seek a protective                   09:02:02  
15 order as to that issue, and I want to go ahead and                   09:02:05  
16 consult about that. I'm assuming you guys are                   09:02:09  
17 going to oppose that and that we probably can't                   09:02:13  
18 reach a compromise. But, you know, we have an                   09:02:18  
19 obligation to consult, so I would like to go ahead                   09:02:21  
20 and get that out of the way.                   09:02:24

21                   MR. WILSON: I guess the -- probably,                   09:02:25  
22 but let us think about it first and discuss, since                   09:02:27  
23 you just brought it to our attention here at 9:00                   09:02:31  
24 o'clock.                   09:02:34

25                   MR. TIMMONS: Of course. Of course. I                   09:02:35

1 don't intend to file it today. I just wanted to 09:02:36  
2 raise the issue. Since we have such a compressed 09:02:40  
3 time frame, I wanted to go ahead and knock it out. 09:02:42

4 MR. WILSON: Okay. 09:02:46

5 MR. TIMMONS: Thank you, Robert. 09:02:47

6 MR. WILSON: All right. Thank you, 09:02:49  
7 Brice. 09:02:49

8 MR. TIMMONS: Have at it. 09:02:49

9 \* \* \*

10 MS. VANESSA RODLEY  
11 was called as a witness and, after having been duly  
12 sworn, testified as follows:

13  
14 EXAMINATION

15 QUESTIONS BY MR. WILSON:

16 Q. Ma'am, could you please state your name for 09:02:51  
17 the record. 09:02:52

18 A. Sure. My full name is Vanessa Danielle Noel 09:02:54  
19 Rodley. 09:02:58

20 Q. Ms. Rodley, my name is Robert Wilson, and I'm 09:03:01  
21 with the Tennessee Attorney General's office and I 09:03:02  
22 represent the State of Tennessee in this matter. 09:03:05

23 Do you understand that you're here today 09:03:07  
24 regarding Rule 30(b)(6) deposition for plaintiff, 09:03:09  
25 Friends of George's? 09:03:13



1 other organization? 09:13:09

2 A. No, sir. 09:13:10

3 Q. And you mentioned that Friends of George's is 09:13:20

4 a not profit -- or nonprofit. Does that mean it 09:13:22

5 doesn't have any shareholders? 09:13:25

6 A. That is correct. It is a nonprofit. 09:13:28

7 Q. Does Friends of George's share any ownership 09:13:39

8 responsibilities with any other business entities? 09:13:43

9 A. No, sir. 09:13:45

10 Q. And where is Friends of George's based? 09:13:49

11 A. Based here in Memphis, Tennessee. 09:13:54

12 Q. What's its address? 09:14:00

13 A. Well, we operate out of 1705 Poplar Avenue, 09:14:02

14 which is the Evergreen Theater. 09:14:05

15 Q. And who-all was involved with the formation 09:14:19

16 of Friends of George's? 09:14:22

17 A. Founding board member -- founding member 09:14:26

18 Tracy Love is the person who organized and founded 09:14:29

19 everything. He's no longer on our board. There are 09:14:33

20 several people who founded that are no longer. The 09:14:36

21 only current board member that was on the original 09:14:39

22 board would be Bill Zachary. 09:14:43

23 Q. What is your role in Friends of George's? 09:14:52

24 A. My role fluctuates all the time based on 09:14:56

25 need, but I am a board member at large. I run back 09:14:59

1 of the house, front of the house, overall 09:15:02  
2 production, business management, social media, 09:15:05  
3 marketing, operations, sometimes direct. I mean, 09:15:08  
4 sometimes choreograph. I mean, we do a lot of 09:15:17  
5 stuff. 09:15:21

6 Q. And what do you mean by back of the house and 09:15:21  
7 front of the house? 09:15:23

8 A. Well, that's a terminology for production. 09:15:25  
9 So back of the house would be behind the stage. So 09:15:26  
10 back of the house is everything behind that, right? 09:15:30  
11 So you have sound, tech, cues being called. You 09:15:34  
12 have performers getting dressed, getting them on the 09:15:39  
13 stage; all kinds of stuff. 09:15:43

14 Front of the house would be everything on 09:15:46  
15 the other side. So audience, back. So audience, 09:15:48  
16 your lobby, right, and that kind of stuff. 09:15:51

17 Q. And how long have you served as a board 09:15:55  
18 member of Friends of George's? 09:16:06

19 A. I've been a board member since 2011. But, 09:16:08  
20 I've been a part of every event since the beginning. 09:16:10  
21 My mother-in-law was a founding board member. 09:16:15

22 Q. Is your mother-in-law still part of the 09:16:29  
23 board? 09:16:31

24 A. No. My mother-in-law passed. 09:16:31

25 Q. Sorry to hear that. 09:16:34

1 George's shows?

09:30:09

2 A. The Sunday and the Thursday are new for us.

09:30:11

3 Those are something that we added last season, so

09:30:14

4 we're still building those. But we normally sell

09:30:17

5 out our Friday and Saturday shows every show we

09:30:20

6 have.

09:30:23

7 Q. And are these shows like Drag Rocks, are

09:30:38

8 these outside of Friends of George's season, or is

09:30:41

9 it part of the production?

09:30:44

10 A. No. It's part of our season. Our season is

09:30:45

11 a theater, a scripted theater show that we do. We

09:30:48

12 do the variety show, which is Dragnificent. And

09:30:50

13 then we do a holiday show.

09:30:53

14 Q. Do I understand correctly the shows are the

09:31:10

15 Dragnificent and the holiday show? Are there any

09:31:14

16 other shows?

09:31:17

17 A. So we have a Dragnificent, which has a

09:31:18

18 theme. This one was Drag Rocks. Then we have a

09:31:20

19 scripted play, which we have all kinds of plays

09:31:23

20 we've written. So Georgia's truck stop, let's say.

09:31:25

21 And then the holiday show is usually a Christmas or

09:31:30

22 a Thanksgiving-themed variety of some sort.

09:31:34

23 Q. And for the scripted plays, is that just one

09:31:43

24 production for Friends of George's?

09:31:47

25 A. Well, it's a scripted production that has six

09:31:49

1 And we only put a tally in there if it's an actual 10:42:26  
2 show. So that will also help you be able to know 10:42:29  
3 the difference. 10:42:33

4 Q. And I think when I asked about the names of 10:42:34  
5 shows, I think you said "hm-hmm." So was -- 10:42:37

6 A. Oh, yes. I'm sorry. The name of the shows 10:42:39  
7 are on there as well. 10:42:42

8 Q. Do you recall if any of those shows were age 10:42:54  
9 restricted that are listed on the document? 10:42:56

10 A. The age restriction ones would be the 10:43:02  
11 Horseshoe Casino events and any of these venues 10:43:06  
12 outside of Evergreen Theater. I'm looking at them 10:43:16  
13 to make sure. Yes. All of these outside of 10:43:24  
14 Evergreen Theater are either bars or casinos. 10:43:30

15 Q. And we might have touched on this a little 10:43:50  
16 bit earlier today, but has Friends of George's 10:43:52  
17 decided what future shows that it plans to conduct? 10:43:54

18 A. Yeah. We are going to do our normal season 10:43:58  
19 next year, so that will kick off end of July -- end 10:44:00  
20 of July, beginning of August, with our play. We 10:44:05  
21 haven't nailed down which play we're doing. We are 10:44:10  
22 scheduled to do Truck Stop and Drag Bar, part two, 10:44:14  
23 but who knows. 10:44:17

24 Q. And going back a little bit, for the 10:44:36  
25 Horseshoe Casino, do you know when the age 10:44:39

1 restrictions on those shows were first imposed? 10:44:42

2 A. Well, I believe those are -- because the 10:44:45

3 casino is age restricted. So I mean -- and the 10:44:49

4 tickets went through, I believe, the casino for the 10:44:51

5 first -- actually, the second time, the tickets went 10:44:53

6 through us. 10:45:04

7 But still, the venue itself is an 10:45:04

8 age-restricted venue. So people just, you know, 10:45:07

9 they can't bring kids to a casino. 10:45:09

10 Q. And how much is a ticket for one of the shows 10:45:19

11 at the Horseshoe Casino for Friends of George's? 10:45:21

12 A. I would have to look back and look for that 10:45:24

13 information for you. 10:45:26

14 Q. Is that information you could provide to your 10:45:33

15 attorneys? 10:45:36

16 A. Yeah. I'm writing it down. I'm going to get 10:45:36

17 that for Brice. 10:45:39

18 Q. Thank you, Ms. Rodley. 10:45:50

19 Has Friends of George's had to cancel any 10:45:51

20 performances in the last five years? 10:45:52

21 A. Yes, we have. 10:45:54

22 Q. And what were the reasons for the -- what 10:45:56

23 shows had to be canceled? 10:46:02

24 A. Our first show back from COVID, our board 10:46:04

25 member died the first night. 10:46:06